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1. Introduction:

I, Marc Wolstenholme, am the plaintiff in this matter, representing myself pro se.

This declaration is made in support of my PLAINTIFF'S MOTION IN LIMINE TO ADMIT

EVIDENCE, to submit additional evidence relevant to my claims against Riot Games, Inc. for copyright infringement, unfair competition, and intentional infliction of emotional distress.

2. Evidence Submitted:

I submit the following evidence of COMPARISON OF CHARACTERS AND STORY ARCS FROM ARCANE & BLOODBORG- VIKTOR AND HIS WHITE-EYED FOLLOWERS, and also WARWICK. This is not an exhaustive list, but serves to demonstrate key elements of my original work and the substantial similarities between my work and the infringing material produced by Riot Games, Inc.

3. Comparison of Characters:

This document specifically shows the striking similarities between Bloodborg content, and Viktor and his white-eyed followers, and Warwick in Arcane and in the Blood Sweat and Tears music video, which is an extended narrative of Arcane.

Viktor in Arcane vs. Themes and Elements in Bloodborg

Introduction:

This document analyses the notable overlaps and striking similarities between Viktor's character in Arcane and central elements of Bloodborg: The Harvest, with a focus on thematic, narrative, and symbolic parallels. Based on the material provided, Bloodborg predates the development of Arcane, suggesting potential conceptual borrowing. The analysis is divided into key thematic categories and narrative comparisons.

Moreover, the analysis will also detail how Bloodborg's Warwick (alleged to have been used as Vander in Arcane), is transformed into a werewolf also called Warwick in Arcane, then turned into a Bloodborg, vampire werewolf hybrid with a gold head.

Viktor

The Case for Infringement: How Arcane's Viktor Mirrors Bloodborg More
Than Riot's Original Game Lore.

1. The Shift in Viktor's Character from League of Legends

Viktor's portrayal in Arcane diverges significantly from his original League of Legends (LoL) lore and gameplay persona. Traditionally, in LoL and Riot's early narratives, Viktor was presented as:

A staunch advocate for technological perfection, not a tragic, frail figure.

A radical visionary who saw himself as humanity's next evolutionary step, rather than an underdog struggling with his mortality.

A rival to Jayce, but not in the same deeply personal way as Arcane presents. In earlier versions, he was more of a detached, ideological adversary.

More akin to a cold, calculating scientist, rather than a sympathetic, suffering individual with a tragic past.

In contrast, Arcane's Viktor:

Is introduced as physically weak and terminally ill, making him emotionally complex and driven by desperation.

Has a deeply personal connection to Jayce, with their dynamic resembling the mentor-disciple and later ideological-rival structure seen in Bloodborg.

Embodies sacrificial transhumanism, transforming himself at great cost, mirroring key characters in Bloodborg.

These drastic changes to Viktor's identity indicate a fundamental departure from Riot Games' original lore—one that aligns more closely with the themes, character arcs, and aesthetics of Bloodborg than with his prior LoL appearances.

2. Core Character Arc

Viktor in Arcane- Viktor is presented as a genius scientist and inventor from humble beginnings in the undercity, driven by desperation to overcome personal physical limitations and societal inequalities. His descent into morally ambiguous choices stems from his pursuit of innovation at any cost. These choices lead to self-experimentation and cybernetic enhancements, tying his survival and ambitions to technological transhumanism. Viktor's emotional complexity is emphasised by his relationships, particularly his partnership with Jayce and his internal conflict between altruistic ideals and self-preservation.

Bloodborg's Parallels- Central figures in Bloodborg, like Lieutenant Dillon

James, Simon, D'borg and General Redgrave, mirror Viktor's physical struggles and their
reliance on prosthetics or bioengineering to continue living and fighting. For instance, Dillon's
escape and subsequent cybernetic transformation to survive directly parallel Viktor's journey of
self-modification to combat his own body's weaknesses. This is mirrored in Roy and Simon and
D'borg.

The ethical tension in Bloodborg over the use of biotechnology to sustain life echoes Viktor's arc, particularly the blood-based bioengineering in Bloodborg, which aligns with Viktor's blood-based hextech experiments that blur the line between life and technology. Both characters exist as tragic figures whose ambitious pursuits result in physical, emotional, and societal alienation.

Whilst Viktor did have some of these traits in the LOL in-game backstories, he was never afflicted nor ill, nor experienced any body dysmorphia. He merely wanted to be the best augmented tin robot, like Dr Doom, who fans and critics have long claimed Viktor's design was "Borrowed" from. Viktor's experiments were metal bionic limbs, diving suits and such.

3. Themes of Physical Weakness and Cybernetic Enhancement Viktor in Arcane

Viktor's reliance on technology stems from his chronic illness and physical fragility, which drive him to embrace scientific augmentation.

His use of blood-infused Hexcore technology mirrors a transhumanist struggle, as he seeks both power and freedom, sacrificing his humanity in the process.

His prosthetic enhancements progressively reshape him into something beyond human, reflecting a duality of salvation and damnation. Yet, unlike the original Viktor, his prosthetic enhancements are gifted to him via the higher consciousness of the "Arcane" via the use of the blood-infused Hexcore.

Bloodborg's Parallels

Bloodborg features multiple characters struggling with physical degradation, necessitating bionic replacements and blood-based engineering and blood-based drugs to build Bloodborgs, which is what both Warwick and Viktor become in Arcane. General Redgrave's transformation from wooden prosthetics to high-tech bionics mirrors Viktor's journey from crude mobility aids to sophisticated cybernetic integration, which is mirrored in Simon Redgrave and D'borg, and of course, Bloodborgs. Moreover, in the LOL backstory of Viktor, he had no such wooden appendages nor appliances.

4. The synthetic bacteria- Bionic Rot Vs Corruption

The synthetic bacteria in Bloodborg, used to merge human flesh with bionics, aligns with Viktor's use of blood-infused Hexcore energy for bodily modification. Both portray the merging of blood, flesh and metal as both a cure and a curse, introducing internal conflict.

Bloodborg's concept of "Bionic Rot", where cybernetic augmentation deteriorates over time, echoes Viktor's struggle as his Hexcore modifications begin to reshape him in unpredictable ways. Moreover, we also see this in the parallel universe Jayce visits which shows views the same concept, which is remarkably similar but called "Corruption." This Corruption, via blood split into it, also caused the hexcore to come to life, merging with Vikoer to begin his transformation into a savior. Blood also spilt onto the basement of the hex gates, making a "Wild Rune." This corruption spread to the tree of life, and also into Jayce, causing the hex crystal

stone on his forearm to fuse into his skin, which is astoundingly similar to that of that of the devise infused into D'borg's forearm.

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5. Class Struggle and Oppression

Viktor in Arcane

Viktor's Zaunite origins paint him as a victim of systemic oppression, fuelling his desire to create technology that bridges social divides. Zaun is depicted as a polluted, neon-lit undercity, contrasting starkly with Piltover's gleaming towers. This visual dichotomy reinforces class conflict, a central theme of his arc. We also see this dichotomy in the two forms of Bloodinfused drugs/ technologies of Hextech and Shimmer (Fusion / Bluebeam and Fetal Sapien Serum). Viktor's ambition to uplift the downtrodden through technology directly informs his moral dilemmas.

Bloodborg's Parallels

Bloodborg similarly emphasizes societal divisions, particularly through the defenders of the Ark versus the dehumanized Nullifidians. The polluted, disease-ridden environments in Bloodborg parallel Zaun's toxic, industrial landscape. Both settings serve as a battleground of survival, oppression, and rebellion.

Several characters in Bloodborg, notably Dillon James and the radical defectors, share Viktor's motivation to challenge oppressive hierarchies through technology, often with



tragic consequences, and Viktor becomes the tyranny, which is the same of D'anna to D'borg, and mirrored in others.

6. Experimentation and Moral Ambiguity

Viktor in Arcane

Viktor's self-experimentation is marked by moral ambiguity, his desperation drives him to push scientific ethics to their limits. His use of blood-infused Hexcore energy introduces themes of unchecked progress, with unforeseen consequences for himself and others. The Hexcore's ability to manipulate life energy is early reminiscent of the Bloodborg concept of synthetic serums drawn from human lifeblood.

Bloodborg's Parallels

Bloodborg explores similar ethical dilemmas, particularly with the Ark's harvesting of human lifeblood to create serums. Just as Viktor's innovations blur the line between saviour and destroyer, the Ark's advancements exist in a moral grey zone, offering progress at a cost. The radicalization of Dillon James, or Josh via Deep-Root mirrors Viktor's internal struggle, as both grapple with the implications of their scientific pursuits.

7. Symbolism: Colour, Technology, and Life Force

Viktor in Arcane- Viktor's journey is visually marked by distinct colours—the blue glow of Hextech and the ominous purple of the Hexcore. His transformation into a part-machine being is accompanied by visual cues of glowing energy, representing his fusion of life and technology.

Bloodborg's Parallels

Bloodborg uses similar colour symbolism—deep purples and greens are associated with Nullifidian weaponry and Ark technology. The pulsating neon environments of Bloodborg strongly parallel Arcane's use of industrial lighting to reflect the fusion of organic and mechanical existence. Both Bloodborg and Arcane depict technology as a double-edged sword, with augmentation symbolising both power and corruption.

8. Tragic Outcomes and Alienation

Viktor in Arcane- As Viktor's transformation progresses, he grows more isolated from his allies, particularly Jayce. His arc is deeply tragic, as he loses touch with his humanity while striving to make the world better.

Bloodborg's Parallels

Dillon James's radicalisation and tragic, symbolic death mirror Viktor's self-destructive ambition, as both are consumed by their ideals. We see this in a few mirror characters in Bloodborg, including Rook, D' Anna, and Katsuko for instance. General Redgrave's alienation after his transformation into a bionic being is another parallel, as both characters are viewed as no longer fully human.

Conclusion: Why This Matters

The reimagined Viktor of Arcane bears striking thematic and aesthetic similarities to Bloodborg, more so than to his original League of Legends counterpart. The themes of transhumanism, class struggle, moral ambiguity, and tragic ambition present in Bloodborg appear reflected in Viktor's reworked arc, raising questions of potential conceptual borrowing. Riot Games altered Viktor's character drastically in Arcane, shifting him away from their original lore and closer to the transhumanist saviour archetype present in Bloodborg. The visual storytelling and thematic depth of Arcane's Viktor aligns with Bloodborg's exploration of technological augmentation and societal oppression. The parallels between the two works are too numerous to ignore, warranting further investigation into the extent of inspiration, borrowing, and infringement.

Final Thought

The uniqueness of Bloodborg's world-building, moral conflicts, and transhumanist philosophy make it a prime candidate for influence over Arcane's reinterpretation of Viktor. If Bloodborg indeed predates Arcane's Viktor's revision, then there is a strong argument for creative appropriation that cannot be dismissed. Exhibits to showcase the evidence of Victor being a Bloodborg will follow.

Exhibits

Exhibit A. Bloodborg Poster.



Exhibit B. Different Viktors

B1. Viktor "The Machine Herald" (From League of legends)









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B2. Viktor "The Arcane Herald" (From Arcane).









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C. Viktor's transformation into a Bloodborg.

C1. Dr Doom.

Viktor was released as a playable Champion in 2011. Viktor was a tinman who augmented himself for fun and for science. He was egotistical, one of his many throw away "Treasured Gateways," voice lines was, "Join the glorious evolution."

It has been alleged and even unofficially agreed upon that Viktor's design was "Borrowed" from Marvel's Dr Doom. Vikoer is pictured on the left, with Dr Doom on the right.





Viktor's original design in League of Legends was heavily inspired by Doctor Doom, the iconic Marvel villain. Both characters share a masked, metallic visage, a cold and calculating demeanor, strong Eastern European voices, and a vision of technological supremacy.

Visual Similarities: Early iterations of Viktor in LoL featured a metallic faceplate, a flowing cape, and a gauntlet-like mechanical arm, reminiscent of Doctor Doom's signature armour.

Philosophical Overlaps: Both characters view technology as the path to power, embracing scientific advancements to transcend human limitations. Doom seeks to rule with intellect and innovation, while Viktor originally pursued "The Glorious Evolution" to perfect humanity, by equipping them with bionic limbs.

Narrative and Personality: Unlike Arcane's tragic and frail Viktor, the original LoL Viktor was a bold, authoritarian figure, much like Doom, he was driven, unwavering, and often at odds with those who opposed his vision.

In contrast, Arcane abandoned this original concept in favour of a more vulnerable, physically weak, and sympathetic character, a stark departure from the Doctor Doom archetype and a move that brings him much closer to the themes and struggles presented in Bloodborg rather than the original League of Legends lore. Then in season two, Arcane turned Viktor into a Bloodborg.

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C2. Steps away from a tinman Dr Doom "trope" and from a bland backstory to a complex and developed character.

Viktor's Transformation Arc:

Viktor begins as a passionate and idealistic inventor, determined to push the boundaries of human potential. However, his health deteriorates, and in desperation, he turns to Shimmer, a blood-abused drug created in the underbelly of Zaun. Viktor experiments with Hextech, but his progress stagnates until a pivotal moment when his own blood spills onto the Hexcore during an experiment. The Hexcore reacts, fusing with his essence and marking the beginning of his transformation.

As Viktor continues his experiments, his body succumbs to the corruption caused by the Hexcore's interaction with his blood. A second incident occurs when his nose bleeds onto the Hexgates's base, accelerating the mutation and further binding him to its power. But this blood spillage caused "The Corruption." Tragically, the Hexcore demands more blood, and Viktor's childhood friend, Sky, becomes its victim, consumed by the Hexcore in a horrifying display.

An explosion, committed by Jinx, who is also addicted to a blood-based drug which enhances her abilities, nearly kills Viktor, leaving him comatose. While unconscious, he enters a state of Hex/Arcane vertical stasis, where his mind is trapped in a dreamlike realm. This spiritual plane connects him to a higher consciousness, where he encounters Sky's spirit. He awakens as a changed man, viewing himself as a saviour to the downtrodden and mutated

As Viktor's body deteriorates further, he is placed into a giant egg-like pod, where he is sustained by a combination of his followers' blood and a white liquid they provide, believing it is necessary to keep him alive. Through this symbiosis, Viktor's mind expands, allowing him to telepathically connect with his followers and even control their thoughts. These followers become his Bloodborg Robots; cybernetic beings bound to his will.

Jayce comes back after being transported to another timeline where he sees the "The Corruption" has wiped out the world. Jayce confronts Viktor, culminating in Jayce striking Viktor with a magical hammer, causing severe damage. Viktor is revived through a mixture of Shimmer, his followers' blood, and the blood of Warwick, a werewolf tied to Zaun's and Singed's darker experiments. Emerging stronger, Viktor re-enters his egg, ascending to a higher plane of existence where he communicates with Sky and gains deeper control over his cult.

Eventually, Viktor hatches from the egg, reborn as a Bloodborg God / mind controlling tyrant. In his final moments, he and Jayce reconcile, sharing an intimate moment of love, hugs, understanding and forgiveness as they float together in the skies above Zaun. Viktor dies of love, leaving behind a complicated legacy of salvation and destruction. He is reborn again in the LOL games, as a glowing blue, alien-like entity.

However, in the games, Viktor's form shifts into a glowing, blue, alien-like man, continuing his arc as a figure both admired and feared.

C3. Visual representation of his transformation from the games to the end of

Arcane.







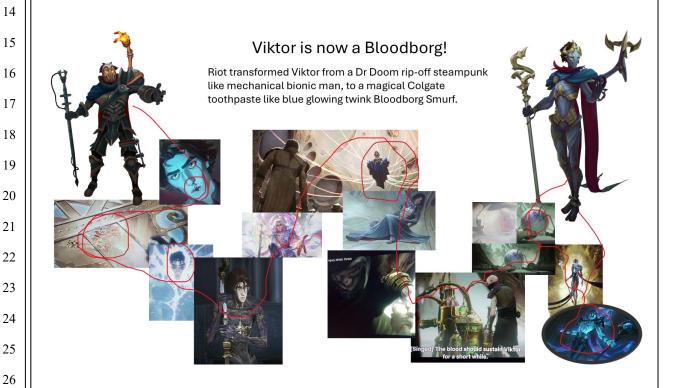








Arcane season 1, Episode 7, Viktor is becoming a Bloodborg.



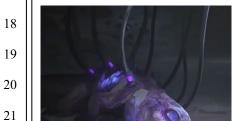
C4. Still images from Arcane, showing Viktor's into a Bloodborg

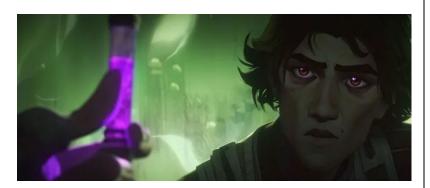
Singed, with the help of Viktor, uses a magical purple flower to feed Rio, cultivated from iridescent water, from the mix of toxic waste.





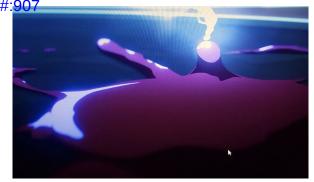
Singed essentially uses Rio's blood as the foundation for creating Shimmer; he extracted the unique regenerative properties from Rio's mutated biology, which was derived from a species of glowing purple flowers she consumed, to create the drug. Singed gives Viktor Shimmer to consume, to prevent, or delay his deteriorating health.





Whilst trying to figure out how to use Hex, Viktor's nose bleeds onto the table and he faints but his blood, now mixed with the Blood-drug Shimmer, awakens hexcore's power.











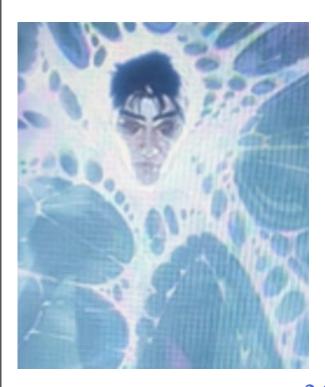
Later, whilst standing on a platform over the base of the Hexgates, Viktor's nose bloods again, this time dripping on the Hexgates and causing "The Corruption."



He Hexcore likes blood, so it drinks Sky.



Jinx fires a rocket and nearly kills Viktor. He goes into a Hex coma, then comes out as a Hex man.



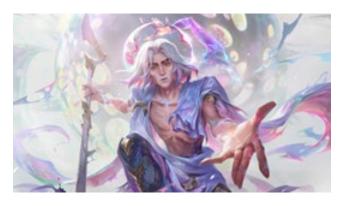


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Viktor, having visited the higher consciousness, redeems mutated Shimmer addicts, then he starts a mind control cult.



He becomes a white Jesus, harvesting white liquid and blood from his followers.





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Jayce kills him, then he goes into an egg, where Singed revives him using the blood of his followers and the blood of a werewolf.







Viktor hatches out of an egg, he is now a bloodborg, and so is the werewolf.







Exhibit D- Extracts from Bloodborg.

D1. Murky White Liquid

BB- "Tubes appeared from the walls of the egg, tunnelling into his arms, drawing his blood out and sending a murky white liquid into his body."



D2. D'Borg's Egg Vs Viktor's egg.

Viktor's healing and transformation egg is remarkably similar to D'borg Egg of the same in Bloodborg, in which it's the transformation, restorative and teleportation egg of D'borg. There is a chapter literally called D'Borg's Egg.

BB- "Energy built up in the air around her, cocooning her in a ball of electric, she panted hard as the cocoon thickened, insulating her from being ripped apart during teleportation, like an egg transported through a fallopian tube.

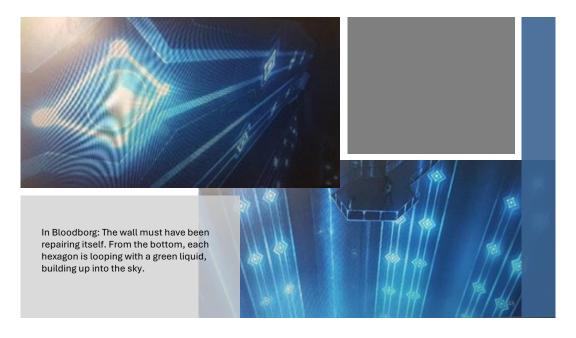
With an almighty crash of thunder and a blinding bolt of white light, she was gone."



D3. The Hexgates of Arcane Vs The Stand of Bloodborg.

In Bloodborg, The Stand (The Wall) is alive. In Arcane this is similar to the Hexgates, which Vikoer bleeds on to cause "The Corruption."

BB- "The wall must have been repairing itself. From the bottom, each hexagon is looping with a green liquid, building up into the sky."



D4. White-eyed followers and plants in their eyes.

The white-eyed and planets inside their eyes.

Still think Linke wrote Arcane, go see my predictions now!



- 1, They also held ocean planets inside their eyes.
- 2, ...they would gain vitality and be saved in the afterlife by the power of the worlds inside the eyeballs.
- $3,\dots$ with the same geometric tribal markings as the woman. The boy had gleaming, brilliant white eyes.
- 4, ...old black guy with white eyes,

D5. The Rupture vs The Corruption

In Bloodborg, Dillon James, who is later called Warwick, blows a hole in the wall and is teleported away. This event is called The Rapture.

In Arcane, Jayce smashes his hammer into the rune, making a hole, then he is teleported away,

BB- "A thump at the door tore away the world. A flash of blood, a pulse of doom, a reek of death. Back on the wall where many died- The explosion, The Rupture. Chris lay on his back amongst the debris of the blast. Warmth trickled from his ringing ears. Unable to move, he peered at the massive hole in The Wall.

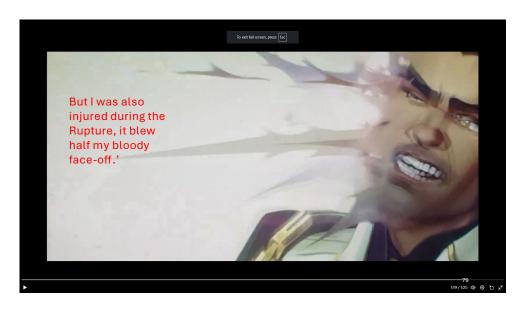
His friend Bill Rewan knelt in the dry mud, his chunky hands gripping the raw flesh of his skull. His exposed jawbone rattling in a nerve fit. His eyeball was dangling from its socket. Lieutenant Dillon James was gone, no trace."





D5. blew half my bloody face-off

BB- 'No, I lost the leg during the 2nd Crusade, a climber got on top of the wall, fuck knows how, he shot me with an explosive round. But I was also injured during the Rupture, it blew half my bloody face-off.'



D6. Ogley eyed spies

BB- "As twilight grew gloomier, the sad mouth in the sky drooped and the resting raindrops peered at Warwick like thousands of ogley eyed spies.



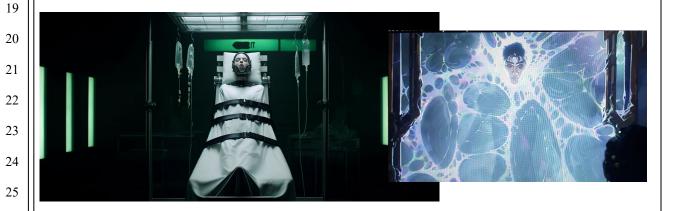
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D7. D'anna Coma Vs Viktor's Coma.

BB- "D'anna woke in a warm Hospital bed. The room was pitch dark. A green exit sign shone above the doors far in front of the bed. Her body and head were strapped to the bed. She could only move her right eye. She peered down at her body; it was covered tightly with a white sheet. She couldn't feel her limbs, less for a twinge in her left leg. A plastic breathing mask covered her nose and mouth, sweaty and stale. Under the plastic, another taste lingered. It confused her, she knew the taste but could not remember it, as if her mind was blocking her from remembering. She focused. She remembered! it was… it was… blood and oil."

BB- "D'anna came around again. She had tubes emerging from every orifice. The one protruding out of her mouth, felt warm and wet, like a mother's nipple. She felt warm and cosy, like a baby breastfeeding.

Her bed was angled up, slanting towards the ground, as if to display her. She could see others, other beds, a line of maybe five, all slanted for display."



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D8- The Teleportation Device.

Analysing Arcane, S1, E4 - The teleporting building of the opening of Episode 4 is taken from a chapter of Bloodborg called Orion's belt.



This is Orion's belt in space. I called this chapter Orion's belt because when the cyborg is about to teleport three circles line up, like Orion's belt. She also lines the three districts up, which look like Orion's belt from above. She lines up the map with the hologram map to select her teleportation destination.

Let's match what I say in the Orion belt chapter to the still images of the arcane show.



Like an orange glow stick, the top of the setting sun peeked over the giant wall to the west.



In Bloodborg I wrote: Wet clouds lingered around ankle hight as she walked over to the ledge of the skyscraper roof. As the last of the sun faded, the clouds lifted, covering D'borg with a layer of dew and revealing the city below.



In bloodborg I wrote: They looked like the three stars of Orion's belt, a constellation D'borg recognised. She looked up to find the constellation, the clouds blocked her view. She noticed a storm brewing in the south. approaching speedily.

She pushed a button on an infinity symbol like device embedded into her forearm. The infinity symbol popped up out of her arm, it shot out a blue ray, which mapped the city and projected it up as a hologram.



D'borg pushed her arm twice, The City's three main districts in her hologram zoomed down, mapping over an Oldworld map of New Kowloon, formally... With the two maps layering each other, she could see the three districtsD'borg mapped the quickest route to the district over midtown.





Later- She felt the tickle building. She looked down at the inside of her forearm. Inside her arm, attached to her was a device in the shape of a figure of eight. She traced her finger over the figure of eight, it rose from her arm and out flicked a globe with several glowing spots. She zoomed in to a blue spot, the ... She rotated the figure of eight zooming it down onto a point near the Air-blade, hovering over an open-top building.

Energy built up in the air around her, cocooning her in a ball of electric, she panted hard as the cocoon thickened, insulating her from being ripped apart during teleportation, like an egg transported through a fallopian tube. With an almighty crash of thunder and a blinding bolt of white light, she was gone.

D9. Infinity symbolism and devise in Jayce's forearm.

BB- "A control device in the shape of the infinity symbol, dropped out of the inside of her forearm and bounced on the rails. Warwick peered down at it; a hologram of the globe flicked out of the display screen. A topographical picture of an Island zoomed out of the globe hologram."



BB- "She looked out over the city, the skyscraper she had climbed was largely cut off from the labyrinth of connecting walkways and giant cables. This area (Lower Manhattan) was a ghost town, ready to fall. Looking past this abandoned part of the city, D'borg could see the city's elevated walkways and streets, linked by three glowing circles which were the three main districts. They looked like the three stars of Orion's belt, a constellation D'borg recognised. She looked up to find the constellation, the clouds blocked her view. She noticed a storm brewing in the south, approaching speedily.

She gazed over the city again. She pushed a button on an infinity symbol like device embedded into her forearm. The infinity symbol popped up out of her arm, it shot out a blue ray, which mapped the city and projected it up as a hologram.

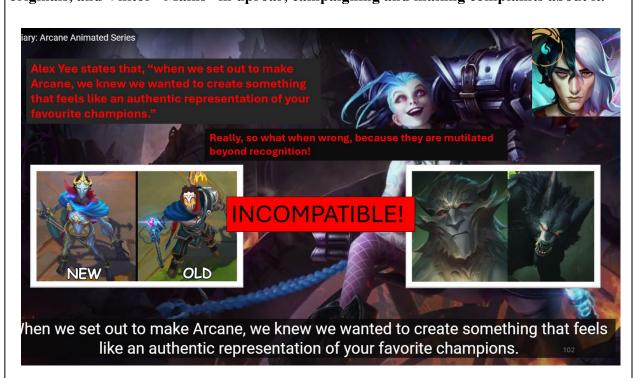
D'borg pushed her arm twice, The City's three main districts in her hologram zoomed down, mapping over an Old-world map of New Kowloon, formally Manhattan. With the two maps layering each other, she could see the three districts."





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E. Bloodborg Viktor and Bloodborg Wawrick are incompatible from the originals, and Viktor "Mains" in uproar, campaigning and making complaints about it.









Declaration

I, Marc Wolstenholme, declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and belief. I submit this declaration in support of my PLAINTIFF'S MOTION IN LIMINE TO ADMIT EVIDENCE, providing a detailed comparison of the alleged infringement of my original work, Bloodborg, by Riot Games, Inc.

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